

Law Offices of Ezra Spilke

1825 Foster Avenue, Suite 1K
Brooklyn, New York 11230
t: (718) 783-3682
e: ezra@spilkelaw.com
www.spilkelaw.com

April 11, 2023

By ECF

The Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Akinpelu*, No. 21 Cr. 609

Your Honor:

With the consent of Pretrial Services and the government, Oluwadamilola Akinpelu requests a modification of her conditions of release to expand her travel restriction to the District of Connecticut. Ms. Akinpelu was arrested on October 13, 2021, and released the same day on the following conditions: a \$100,000 personal recognizance bond with travel limited to SDNY/EDNY and the District of Connecticut for purposes of meeting with counsel and her parents. The proposed modification would remove the limitation as to the purposes of Ms. Akinpelu's travel to Connecticut.

Ms. Akinpelu is employed as a personal care assistant in Litchfield County, Connecticut, where her parents live and where she would live with them. Due to mutual confusion about the travel conditions, Ms. Akinpelu has been residing with her parents to save money. Ms. Akinpelu has always been compliant with the conditions of her release and has always apprised Pretrial Services of her whereabouts. The proposed modification would cure Ms. Akinpelu's, counsel's and Pretrial Services' oversight of the dictates of the travel restriction.

Ms. Walker is in compliance with the conditions of her release. As noted, Pretrial Services Officer Francesca Piperato has no objection to this request. I have conferred with AUSA Kaylan Lasky, counsel for the government, who informs me that the government defers to Pretrial Services.

Respectfully submitted,


Ezra Spilke

SO ORDERED.


4/12/23

cc: Counsel of record, by ECF
Francesca Piperato, by email